

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**ELEVENTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	12/01/2023	12/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$146,882.80 ¹ (80% of \$183,603.50)	
Total Reimbursable Expenses Requested in this Statement:	\$16,805.98 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$172,831.00	
Total Actual Attorneys Hours Covered by this Statement:	380.60	
Average Hourly Rate for Attorneys:	\$454.10	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$10,772.50	
Total Actual Paraprofessional Hours Covered by this Statement:	38.90	
Average Hourly Rate for Paraprofessionals:	\$276.92	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Eleventh Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from December 1, 2023 through December 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$146,882.80 (80% of \$183,603.50) as compensation for professional services rendered to the Debtor during the period from December 1, 2023 through December 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$16,805.98, for a total amount of \$163,688.78 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$183,603.50 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$16,805.98 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$163,688.78 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX

Dated: February 5, 2024

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

2525 McKinnon St., Suite 425

Dallas, TX 75201

Telephone: 737.218.6187

Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on February 5, 2024, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	2,732.98
Online Research	247.80
Court Fees	588.0
Deposition Transcripts	3,021.20
Litigation Support Vendors	10,036.00
Other Professionals	180.00

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	1.4	5.5
B120 Asset Analysis and Recovery	0.0	0.0
B130 Asset Disposition	2.6	2.8
B140 Relief from Stay/Adequate Protection	1.7	0.0
B150 Meetings of & Communications with Creditors	0.0	0.0
B160 Fee/Employment Applications	20.7	15.4
B170 Fee/Employment Objections	6.2	1.4
B180 Avoidance Action Analysis	0.0	0.0
B185 Assumption/Rejection of Executory Contracts	0.0	0.0
B190 Other Contested Matters	99.2	5.4
B195 Non-Working Travel	13.6	0.0
B210 Business Operations	4.6	0.0
B220 Employee Benefits/Pensions	0.00	0.0
B230 Financing/Cash Collections	1.5	0.0
B240 Tax Issues	0.0	0.0
B250 Real Estate	0.0	0.0
B260 Board of Directors Matters	0.0	0.0
B310 Claims Administration and Objections	6.5	2.2
B320 Plan and Disclosure Statement	222.6	0.0
B410 General Bankruptcy Advice/Opinions	0.0	0.0
B420 Restructurings	0.0	0.0
TOTALS:	380.6	38.9

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

February 2, 2024
Invoice # 770571

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post - petition

INVOICE SUMMARY

Current Invoice Total Fees	<u>\$183,603.50</u>
Current Invoice Total Expenses	<u>\$16,805.98</u>
Current Invoice Total	<u>\$200,409.48</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 770571 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

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12/01/2023	J. Davis	B190	Assist with reviewing, editing, and drafting of the Reply Briefs in support of our Motion for Leave to Appeal, filed in both the Texas Plaintiffs and Conn. Plaintiffs adversary proceedings.	4.50
12/01/2023	V. Driver	B320	Review case law on third party injunctions.	1.10
12/01/2023	D. McClellan	B190	Draft reply to Connecticut plaintiff's response to Debtor's motion for leave to file interlocutory appeal.	7.50
12/01/2023	E. Weaver	B110	Review email correspondence from Yasmine Rivera with the US Trustee's office regarding quarterly fees and forward same to BlackBriar Advisors.	0.20
12/01/2023	E. Weaver	B110	Review agreed scheduling order for confirmation hearing and docket all dates and deadlines.	1.30
12/01/2023	E. Weaver	B170	Finalize fee detail spreadsheet for Teneo Capital and circulate to BlackBriar Advisors.	1.00
12/01/2023	R. Yates	B190	Coordinate regarding legal strategy and planning for reply brief in support of motion for leave to file interlocutory appeal.	0.50
12/01/2023	J. Yoon	B190	Analyze and review local rules and judge-specific rules cross-motion requirements for appeals.	0.70
12/02/2023	D. McClellan	B190	Continue drafting reply to Connecticut plaintiff's response to Debtor's motion for leave to file interlocutory appeal.	14.20
12/03/2023	D. Harlan	B190	Perform research and analysis for reply brief.	1.70
12/03/2023	D. Harlan	B190	Research SD Tex and Judge's rules regarding motions and responses.	0.60
12/03/2023	D. McClellan	B190	Draft reply to Texas plaintiff's response to Debtor's motion for leave to file interlocutory	7.30

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			appeal.	
12/03/2023	D. McClellan	B190	Continue drafting reply to Connecticut plaintiff's response to Debtor's motion for leave to file interlocutory appeal.	8.20
12/03/2023	C. Stephenson	B190	Review and revise Reply to CT Response to Motion for Leave to Appeal (.9); draft related correspondence (.8).	1.70
12/03/2023	R. Yates	B190	Edit draft of reply in support of motion for leave to file interlocutory appeal.	1.20
12/03/2023	J. Yoon	B190	Analyze and review interlocutory appeals in preparation to draft reply to the response to the motion for leave to appeal interlocutory appeals.	1.50
12/04/2023	D. Harlan	B160	Gathering and analyzing relevant documents to draft informal objection to Teneo's eighth and ninth monthly fee statements.	0.70
12/04/2023	D. McClellan	B190	Revise and finalize replies to Connecticut and Texas plaintiffs' responses to Debtor's motions for leave to file interlocutory appeal.	4.80
12/04/2023	C. Stephenson	B170	Review and analyze Teneo fee objections (.9); draft related correspondence (.5).	1.40
12/04/2023	C. Stephenson	B190	Review and analyze Replies to Responses to Motion for Leave to Appeal (1.7); review and respond to related correspondence (.8).	2.50
12/04/2023	E. Weaver	B170	Final review of Teneo fee spreadsheet and email correspondence to Bob Schleizer regarding same.	0.40
12/04/2023	E. Weaver	B190	Finalize and file AJ's reply to plaintiffs' response in opposition to defendant's motion for leave to file interlocutory appeal in each adversary.	0.80
12/04/2023	R. Yates	B190	Review final drafts of reply on motion for leave to file interlocutory appeal.	0.90
12/04/2023	J. Yoon	B190	Research timeliness of cross-appeal of	9.40

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			interlocutory appeal (0.7); draft and revise Texas and the Connecticut reply briefs (8.7).	
12/04/2023	J. Yoon	B190	Draft and revise pro hac vice motions for admissions of Deric J. McClellan and Chris Davis.	0.70
12/05/2023	L. Dauphin	B190	Apply pre-production quality and coding conflict checks.	0.40
12/05/2023	V. Driver	B140	Review and approve lift stay continuance (.2); emails to TX trial team on extension of stay and budget limitations. (.2)	0.40
12/05/2023	V. Driver	B160	Draft correspondence regarding employment of real estate brokers.	0.60
12/05/2023	V. Driver	B170	Review notice of increased hourly rates from Akin.	0.20
12/05/2023	V. Driver	B190	Review and revise entry of appearance and suggestion of BK in FSS and PQPR adversary (.4); review document production. (2.4)	2.80
12/05/2023	D. Harlan	B130	Review and edit Motion to Employ Broker for sale of the lakehouse property.	0.60
12/05/2023	D. Harlan	B190	Perform document review.	1.50
12/05/2023	D. Harlan	B320	Research relevant information and drafting disclosure statement.	6.50
12/05/2023	C. Stephenson	B170	Review and respond to various correspondence regarding fee objections.	0.80
12/05/2023	E. Weaver	B110	Download, review notice of rate increase filed by UCC and circulate to team.	0.10
12/05/2023	E. Weaver	B130	Review email correspondence from BlackBriar Advisors regarding storage facility liquidation and contract regarding same.	0.30
12/05/2023	E. Weaver	B130	Review listing agreement and revise motion to employ broker for the lake house property (.8); prepare redline of same and circulate for	1.00

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			approval (.2).	
12/05/2023	E. Weaver	B160	Review listing agreement and revise motion to employ broker for the ranch property (.8); prepare redline of same and circulate for approval (.2).	1.00
12/05/2023	E. Weaver	B190	Draft notice of appearance and suggestion of bankruptcy for the PQPR Holdings adversary.	1.50
12/05/2023	J. Yoon	B190	Draft and prepare pro hac vice motions for Deric J. McClellan and Chris Davis for admission to respective proceedings in the Connecticut appeal and the Texas appeal.	1.40
12/06/2023	V. Driver	B130	Review and revise CNO for property sale.	0.20
12/06/2023	V. Driver	B190	Review and respond to detailed emails on follow up items related to discovery requests (.9); work through issues to get responses to discovery items (1.3).	2.40
12/06/2023	V. Driver	B320	Call with creditors working on plan negotiations.	1.10
12/06/2023	D. Harlan	B190	Perform document review.	5.60
12/06/2023	D. Harlan	B320	Researching relevant information and drafting disclosure statement.	6.50
12/06/2023	C. Stephenson	B320	Research and analysis regarding plan of reorganization.	2.30
12/06/2023	E. Weaver	B130	Draft and file certificate of no objection to motion for order authorizing sale of personal property (.4); finalize and file propose order regarding same (.2).	0.60
12/06/2023	E. Weaver	B190	Finalize and file notice of appearance and suggestion of bankruptcy in the PQPR Holdings adversary.	0.60
12/06/2023	J. Yoon	B190	Call with the Court and coordinate PHV filings for Deric J. McClellan and Chris Davis.	0.50

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12/07/2023	L. Dauphin	B190	Prepare supplemental client document production.	1.00
12/07/2023	D. Harlan	B190	Edit formatting on privilege log.	4.50
12/07/2023	D. Harlan	B320	Draft disclosure statement.	3.80
12/07/2023	E. Weaver	B130	Review order granting motion for sale of property free and clear of liens and circulate same to team.	0.20
12/07/2023	E. Weaver	B190	Finalize and file motion for pro hac vice for Chris Davis and Deric McClellan in both adversary cases.	0.60
12/08/2023	L. Dauphin	B190	Revise supplemental client document production.	0.30
12/08/2023	L. Dauphin	B190	Conference related to privilege log preparation and export from Everlaw.	0.20
12/08/2023	V. Driver	B190	Work through creditor terms, settlement offers, and plan terms for drafting and structure.	3.50
12/08/2023	D. Harlan	B190	Edit formatting on privilege log.	3.80
12/08/2023	D. Harlan	B320	Draft disclosure statement.	4.10
12/08/2023	C. Stephenson	B160	Review and revise billing.	1.70
12/08/2023	C. Stephenson	B170	Meeting with financial advisor regarding fee objections (.8); call regarding same (.3).	1.10
12/08/2023	C. Stephenson	B320	Meeting with financial advisor regarding plan issues.	2.80
12/09/2023	D. Harlan	B320	Draft disclosure statement.	1.80
12/10/2023	D. Harlan	B320	Draft disclosure statement.	2.50
12/11/2023	V. Driver	B110	Review emails on UCC Crypto issues and respond briefly.	0.40
12/11/2023	V. Driver	B190	Calls with potential transferees negotiating potential settlement and discussing defenses (.9); emails with counsel for the Texas plaintiffs regarding suggestion of BK filed in	1.50

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			PQPR lawsuit (.4); emails on Greenleaf trust issues raised by K. Jones (.2).	
12/11/2023	V. Driver	B195	Travel from Austin to Dallas (billed at half-time 3.8).	1.90
12/11/2023	V. Driver	B210	Call with Whiskey partner on issues with margins and new contract (.5); emails regarding same (.1).	0.60
12/11/2023	D. Harlan	B195	Travel to Austin (billed at half time).	3.00
12/11/2023	D. Harlan	B320	Draft disclosure statement.	3.10
12/11/2023	C. Stephenson	B195	Travel from Dallas to Austin [6.0 billed at half time].	3.00
12/11/2023	E. Weaver	B160	Review compensation order and begin drafting second interim fee application of C&D.	1.80
12/12/2023	V. Driver	B130	Emails with UCC regarding personal property sales and cost (.3); discuss rates and notices needed for sales (.4).	0.70
12/12/2023	V. Driver	B210	Discussion regarding potential marketing deals.	0.40
12/12/2023	V. Driver	B320	Analyze strategy regarding plan terms and meetings with client and constituents on plan term options (3.2); review and revise plan (3.6).	6.80
12/12/2023	D. Harlan	B320	Draft disclosure statement.	8.00
12/12/2023	C. Stephenson	B320	Attend plan working meetings and discussions (3.8); revise plan draft (2.6).	6.40
12/12/2023	E. Weaver	B130	Prepare outline of notice procedures for proposed sale of personal property and circulate to team.	0.60
12/12/2023	E. Weaver	B160	Draft ninth monthly fee statement of BlackBriar Advisors.	2.00
12/12/2023	E. Weaver	B160	Finalize draft of second interim fee application of C&D and circulate for approval.	2.00
12/13/2023	V. Driver	B110	Call with K. Porter on extension to exemption	0.20

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Responsible Attorney

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			objection .2.	
12/13/2023	V. Driver	B160	Review and analyze fee app filings and pro rata sharing for payments.	0.40
12/13/2023	V. Driver	B190	Call with counsel for potential transferee to discuss settlement (.9); discuss same with client (.7).	1.60
12/13/2023	V. Driver	B195	Travel from Austin to Dallas (billed at half-time 3.8).	1.90
12/13/2023	V. Driver	B210	Call with Wulff on bourbon contract and issues with same.	0.40
12/13/2023	V. Driver	B320	Review and revise plan (3.7); meeting with client explaining and describing plan and taking comments to same (1.1); strategy discussion on plan terms with co-counsel (.7).	5.50
12/13/2023	D. Harlan	B195	Travel to Dallas (3.8 billed at half time).	1.90
12/13/2023	D. Harlan	B320	Draft disclosure statement.	8.00
12/13/2023	C. Stephenson	B195	Travel from Austin to Dallas [3.8 billed at half-time].	1.90
12/13/2023	C. Stephenson	B320	Draft and revise plan of reorganization (3.2); draft related correspondence (1.1); client meeting regarding same (1.8).	6.10
12/13/2023	E. Weaver	B160	Draft second interim fee application of BlackBriar Advisors.	3.40
12/13/2023	J. Yoon	B160	Review the interim compensation procedures order in preparation to draft interim fee statements for The Reynal Law firm and Martin, Disiere, Jefferson & Wisdom LLP (0.4); draft and revise the same (0.7).	1.10
12/14/2023	V. Driver	B190	Call with counsel for transferee on potential settlement.	0.90
12/14/2023	V. Driver	B320	Review and revise plan and analyze revisions needed. (3.6); call with committee on plan	4.30

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			filing. (.7)	
12/14/2023	D. Harlan	B320	Proofreading and eliminating formatting issues on the Plan.	3.80
12/14/2023	C. Stephenson	B320	Draft and revise Plan of Reorganization (3.3); review and respond to related correspondence (1.8).	5.10
12/14/2023	E. Weaver	B130	Email correspondence to BlackBriar Advisors regarding employment of auctioneer.	0.10
12/14/2023	E. Weaver	B160	Finalize draft of motion to employ auctioneer and circulate for approval.	0.80
12/14/2023	J. Yoon	B160	Draft and revise interim fee statements for the Reynal Law Firm and Martin, Disiere, Jefferson & Wisdom LLP.	1.50
12/15/2023	V. Driver	B110	Review and approve exemption deadline extension.	0.40
12/15/2023	V. Driver	B320	Review and revise plan and prepare for filing (2.7); calls and emails with various constituencies on comments and finalizing plan for filing (1.9).	4.60
12/15/2023	D. Harlan	B320	Review and format Plan.	3.60
12/15/2023	D. Harlan	B320	Draft disclosure statement.	4.00
12/15/2023	T. Rinck	B320	Draft Table of Contents based upon analysis of the Debtor's Plan of Reorganization.	5.20
12/15/2023	C. Stephenson	B320	Review and finalize Plan of Reorganization.	4.80
12/15/2023	E. Weaver	B110	Review email correspondence from US Trustee's office regarding remaining bank statements and accounts needed (.1); compare with bank statements previously sent to their office (.4).	0.50
12/15/2023	E. Weaver	B110	Review fifth stipulation extending motion to objection to exemptions and docket deadline for same.	0.20

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12/15/2023	E. Weaver	B110	Electronic case filing management.	0.60
12/15/2023	E. Weaver	B160	Revise, finalize and file second interim fee application for BlackBriar Advisors and serve same.	1.80
12/15/2023	E. Weaver	B320	Finalize and file AJ's plan of reorganization (.6); review UCC's plan of liquidation and circulate to team (.2).	0.80
12/15/2023	E. Weaver	B320	Review email correspondence regarding opt-in-settlement for unsecured claims and begin working on exhibit to plan (.4); begin drafting motion to seal plan exhibit (1.0).	1.40
12/16/2023	D. Harlan	B320	Draft disclosure statement.	2.00
12/17/2023	D. Harlan	B320	Draft disclosure statement.	4.70
12/18/2023	V. Driver	B160	Emails on retainers and issues on Martin and Reynal fee statements.	0.40
12/18/2023	V. Driver	B190	Emails with UCC on open discovery requests and related information requests.	1.30
12/18/2023	V. Driver	B210	Revise employment agreement.	1.40
12/18/2023	V. Driver	B320	Disclosure Statement drafting (1.7); calls with claimants seeking input on plan and terms for potential settlement (.9); responding to emails from UCC on plan clarifications (.4); reviewing plan and start amendments to address issues (.6).	3.20
12/18/2023	D. Harlan	B160	Edit Motion to Employ Broker for Ranch property.	0.80
12/18/2023	D. Harlan	B320	Edit initial draft of disclosure statement.	4.80
12/18/2023	D. Harlan	B320	Draft confirmation order.	5.20
12/18/2023	E. Weaver	B110	Review spreadsheet received from BlackBriar Advisors and draft October monthly operating report.	2.00
12/18/2023	E. Weaver	B320	Review draft disclosure statement and prepare list of exhibits (.3); circulate same to team	0.40

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(1).

12/18/2023	J. Yoon	B160	Draft and revise consolidated interim fee statements for Martin, Disiere, Jefferson & Wisdom LLP and proposed order granting the same.	3.70
12/18/2023	J. Yoon	B160	Draft and revise consolidated interim fee statements for The Reynal Law Firm and proposed order granting the same.	3.20
12/19/2023	V. Driver	B320	Edit Disclosure Statement (4.3); working on liquidation analysis. (.8)	5.10
12/19/2023	D. Harlan	B160	Edit Motion to Employ Broker for sale of Ranch property.	0.50
12/19/2023	D. Harlan	B320	Edit Disclosure Statement.	3.90
12/19/2023	D. McClellan	B320	Draft section discussing Connecticut adversary action for disclosure filing.	1.50
12/19/2023	C. Stephenson	B160	Review and revise October and November billing (4.8); draft related correspondence (1.1).	5.90
12/19/2023	E. Weaver	B110	Finalize and file October monthly operating report.	0.60
12/20/2023	V. Driver	B210	Email seeking clarification on employment agreement term from employment counsel (.4); revise contract regarding same. (.4)	0.80
12/20/2023	V. Driver	B320	Internal call working through group comments and questions on Disclosure Statement draft (1.3); Call with claimants on points and issues (.7); call with subV Trustee counsel on status (.8); review and revise Disclosure Statement and preparing for filing (1.8).	4.60
12/20/2023	D. Harlan	B130	Edit the Motion to Employ Auctioneer to Sell Contents of Storage Units.	1.10
12/20/2023	D. Harlan	B310	Review UCC's Plan for potential objections.	1.50
12/20/2023	D. Harlan	B310	Draft objections to Creditors' Plan.	3.00

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12/20/2023	D. Harlan	B320	Edit Disclosure Statement.	7.00
12/20/2023	D. Harlan	B320	Call with FA and other attorneys regarding disclosure statement edits.	1.10
12/20/2023	D. McClellan	B320	Draft section discussing Texas adversary action for disclosure filing.	0.50
12/20/2023	C. Stephenson	B320	Review and revise Disclosure Statement (3.3); calls and correspondence regarding same (1.8).	5.10
12/20/2023	E. Weaver	B160	Finalize and file first monthly fee statement of the Reynal Law Firm, P.C. and serve same.	0.60
12/21/2023	V. Driver	B110	Correspondence regarding seal schedules; (.2) correspond with UCC on same (.2).	0.40
12/21/2023	V. Driver	B320	Working on Disclosure Statement and plan issues.	3.20
12/21/2023	D. Harlan	B310	Draft objections to Creditors' Plan.	2.00
12/21/2023	D. Harlan	B320	Edit disclosure statement.	3.80
12/21/2023	D. McClellan	B320	Draft section discussing Texas adversary action for disclosure filing.	1.20
12/21/2023	C. Stephenson	B320	Review and revise Disclosure Statement (2.3); draft related correspondence (1.8); calls regarding same (1.2).	5.30
12/21/2023	E. Weaver	B160	Finalize and file tenth monthly fee statement of C&D and serve via email to notice parties.	0.80
12/21/2023	E. Weaver	B160	Finalize and file employment application for Keller Williams Realty and serve via email to notice parties.	0.60
12/21/2023	E. Weaver	B160	Finalize and file employment application for Davis Auctioneers and serve via email to notice parties.	0.60
12/21/2023	E. Weaver	B320	Finalize and file proposed Disclosure Statement.	0.60
12/22/2023	D. Harlan	B320	Draft objections to Creditors' Plan.	3.00

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12/22/2023	D. Harlan	B320	Perform research related to UCC Plan objections.	4.40
12/26/2023	V. Driver	B210	Emails with FSS counsel on setting employment motion.	1.00
12/26/2023	D. Harlan	B320	Research related to UCC Plan objections.	3.40
12/26/2023	D. Harlan	B320	Draft objections to Creditors' Plan.	2.00
12/26/2023	D. Harlan	B320	Call regarding UCC plan objections.	0.50
12/27/2023	D. Harlan	B320	Draft objections to Creditors' Plan.	4.60
12/27/2023	D. Harlan	B320	Research related to UCC Plan objections.	3.50
12/27/2023	C. Stephenson	B320	Draft correspondence regarding plan research issues.	0.80
12/27/2023	J. Yoon	B230	Analyze and review Youngevity document production and responses in preparation for analysis (1.0); draft email analysis regarding Youngevity document production and objections (.5).	1.50
12/27/2023	J. Yoon	B320	Research plan issues regarding class treatment.	2.80
12/28/2023	D. Harlan	B160	Email financial advisor about property sale motions.	0.20
12/28/2023	D. Harlan	B320	Research related to UCC Plan objections.	3.50
12/28/2023	D. Harlan	B320	Discuss objections to UCC Plan.	0.50
12/28/2023	D. Harlan	B320	Edit objections to Creditors' Plan.	2.80
12/28/2023	C. Stephenson	B170	Call and correspondence with financial advisor regarding fee objections.	1.30
12/28/2023	C. Stephenson	B320	Review and analyze plan research (1.8); review and analyze UCC Plan (2.2); call and correspondence regarding same (.9); review plan objections (1.3).	5.20
12/29/2023	V. Driver	B140	Review and analyze email from IRS on refunds and status of IRS (.6); respond to same (.4); call with FA regarding same. (.3)	1.30

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12/29/2023	D. Harlan	B320	Edit objections to Creditors' Plan.	2.80
12/29/2023	D. Harlan	B320	Perform research related to UCC Plan objections.	2.50
12/29/2023	D. Harlan	B320	Research governing case law authorities on ability of debtor with non-dischargeable debt to include broad, permanent plan injunction.	3.10
12/29/2023	C. Stephenson	B170	Call and correspondence regarding objections to UCC professional fees.	1.40
12/30/2023	D. Harlan	B320	Perform and analyze Plan research.	5.10
12/31/2023	D. Harlan	B320	Perform and analyze Plan research.	3.30
Total Hours				419.50
Total Fees for this Invoice				\$183,603.50

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	6.90	2,735.50	Bankruptcy - Case Administration
B130	5.40	2,017.50	Bankruptcy - Asset Disposition
B140	1.70	1,351.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	36.10	14,413.50	Bankruptcy - Fee/Employment Applications
B170	7.60	4,862.00	Bankruptcy - Fee/Employment Objections
B190	104.60	40,561.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B195	13.60	7,896.50	Bankruptcy - Non-Working Travel
B210	4.60	3,657.00	Bankruptcy - Business Operations
B230	1.50	427.50	Bankruptcy - Financing/Cash Collections
B310	6.50	1,820.00	Bankruptcy - Claims Administration and Objections
B320	231.00	103,861.00	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	419.50	\$183,603.50	

12/06/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month November 2023	\$5,005.00
12/11/2023	Harlan, Danielle reimbursement of 11/29/2023 uber expense	17.72
12/22/2023	Texas Southern Bankruptcy Court for Filing Fee for Motion to Sell Personal Property 11/14/2023	188.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Chris Davis- CT Appeal 12/7/2023	100.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Derric McClellan- CT Appeal 12/7/2023	100.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Chris Davis- CT Appeal 12/7/2023	100.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Derric McClellan - CT Appeal 12/7/2023	100.00
12/28/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for Client Meeting 12/11-13/2023; 404 miles .655/mile= \$ 264.62,	1,788.92

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	lodging \$ 1142.50 and meals \$ 381.80	
12/29/2023	Harlan, Danielle reimbursement of travel expenses to Houston Texas for depositions 11/26-29/2023; transportation \$ 764.17 and meals \$ 162.17	926.34
01/05/2024	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of December 2023	5,031.00
01/25/2024	Esquire Deposition Solutions for deposition 9/12/2023	1,434.85
01/25/2024	Esquire Deposition Solutions for depositions 9/13/2023	1,586.35
01/25/2024	Digital Mountain for document storage	180.00
Subtotal of Expenses		<u>\$16,558.18</u>
Online Research		<u>\$247.80</u>
Subtotal of Costs		<u>\$247.80</u>
Total Expenses and Costs for this Invoice		<u>\$16,805.98</u>

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E106	247.80	On-line research
E110	2,732.98	Out-of-town travel
E112	588.00	Court fees
E115	3,021.20	Deposition transcripts
E118	10,036.00	Litigation support vendors
E123	180.00	Other professionals
Total	<u>\$16,805.98</u>	

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Total For This Invoice

\$200,409.48

SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
L. Dauphin	1.90	185.00	351.50
T. Rinck	5.20	200.00	1,040.00
D. McClellan	45.20	310.00	14,012.00
V. Driver	67.50	795.00	53,662.50
C. Stephenson	66.60	715.00	47,619.00
E. Weaver	31.80	295.00	9,381.00
R. Yates	2.60	340.00	884.00
J. Davis	4.50	475.00	2,137.50
J. Yoon	28.00	285.00	7,980.00
D. Harlan	166.20	280.00	46,536.00
Total	419.50		\$183,603.50